

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI**

FAULKNER LITERARY RIGHTS, LLC

PLAINTIFF

VS.

CIVIL ACTION NO. 3:12-CIV-100-M-A

SONY PICTURES CLASSICS INC.

And JOHN DOE PERSONS OR

ENTITIES 1-100

DEFENDANTS

**PLAINTIFF AND DEFENDANT’S JOINT MOTION FOR STAY PENDING
THE COURT’S RULING ON PENDING MOTIONS**

Plaintiff Faulkner Literary Rights, LLC (“Plaintiff”) and Defendant Sony Pictures Classics Inc. (“Sony Classics”) hereby submit the following joint motion to stay this matter pending the Court’s ruling on two motions: Sony Classics’ Motion to Dismiss for Failure to State a Claim (Dkt. No. 11) and Sony Classics’ Motion to Transfer Venue (Dkt. No. 13) (collectively, the “Pending Motions”).

Both Pending Motions are fully briefed and under submission with the Court. Following the close of that briefing, the parties have exchanged initial disclosures and an initial set of discovery requests and responses, including interrogatories, requests for production of documents, and requests for admission, and responses and objections thereto. The parties have not, however, incurred the significant expenses of complete document discovery, depositions of fact witness, or expert discovery. Because the Pending Motions could resolve this case without the need to incur these discovery expenses, or lead to resolution of this matter in a different jurisdiction on a

different discovery and trial calendar with additional legal counsel, the parties believe that a stay of this matter until the Pending Motions are resolved would serve the interests of justice and provide for the most efficient resolution of this litigation.

The parties further believe that this stay will not necessarily require the Court to adjourn the current trial date of April 7, 2014, though the parties must reserve the right to seek such an adjournment, should this motion be granted, and depending on when the Pending Motions are resolved.

Dated: Oxford, Mississippi
May 28, 2013

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By: /s/ Cal Mayo
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Dated: New York, New York
May 28, 2013

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Dated: Ridgeland, Mississippi
May 28, 2013

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CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Defendant Sony Pictures Classics Inc. does hereby certify that she has this day served a true and correct copy of the above and foregoing document by via the Court's Electronic Case Filing System which sent notification to the following:

J. Cal Mayo
Pope S. Mallette
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ATTORNEYS FOR PLAINTIFF

SO CERTIFIED, this the 28th day of May, 2013.

/s/ Anita Modak-Truran
ANITA MODAK-TRURAN

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